

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

RECEIVED

SEP 12 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Petition for Rule Making of the Cellular)	File No. RM – 9920
Telecommunications Industry Association)	
Concerning Implementation of WRC-2000:)	
Review of Spectrum and Regulatory)	
Requirements for IMT-2000)	

**DOCKET FILE COPY ORIGINAL
REPLY COMMENTS OF
THE CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

The Cellular Telecommunications Industry Association (“CTIA”) hereby submits reply comments in the above captioned proceeding.¹ CTIA asked the Commission to initiate this proceeding to begin the important process of designating additional spectrum for third generation (“3G”) wireless service in a manner consistent with the decisions recently adopted at the World Radiocommunications Conference 2000 (“WRC-2000”).²

Several parties filed comments responding to CTIA’s petition. CTIA believes that this record supports the following points: (1) additional spectrum is needed for successful implementation of third generation services; (2) spectrum harmonization is vital to facilitate worldwide roaming capability, a key feature of 21st century mobile communications; and (3) further coordination and study of the best way to accommodate

¹ CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service (“CMRS”) providers and manufacturers. CTIA represents more broadband PCS carriers and more cellular carriers than any other trade association.

² *Public Notice*, “Comment Invited on Third Generation Wireless/IMT-2000 Petitions,” DA 00-1673, released July 28, 2000.

No. of Copies rec'd 0 + 9
List A B C D E

existing spectrum uses and future spectrum needs must commence without delay.

Accordingly, to meet the nation's critical needs for 3G wireless services, the Commission should concurrently commence a new proceeding, begin consultation and coordination with the National Telecommunications Information Administration ("NTIA"), the Department of Defense, and other government users, and commission and complete the necessary studies.

As CTIA stated in its petition for rule making, the sooner the FCC can designate additional spectrum for 3G wireless services, the quicker the industry can deliver advanced wireless services and products to American consumers.³ Experience teaches that spectrum allocation is a long process because it requires difficult choices between the interests of incumbent licensees and new entrants, governmental and non-governmental users, and domestic and international policies. Accordingly, it is critical that the Commission commence this process immediately to better inform the FCC's decisions and spectrum policy initiatives in an effort to keep the U.S. in step with the rest of the world.

CTIA urges the Commission to begin now the process needed to designate additional spectrum for 3G wireless services in a manner consistent with the decisions made at the WRC-2000. Immediate action on CTIA's petition is needed to provide the wireless industry with the spectrum it needs to continue its growth and to foster the introduction of the key features of 21st century mobile communications services. Moreover, the advanced efforts of European and Asian countries to license and deploy

³ See Petition for Rule Making of CTIA Concerning Implementation of WRC – 2000: Review of Spectrum and Regulatory Requirements for IMT -2000, filed July 12, 2000, at 4-6.

3G systems, and the lead time needed for the industry to develop and deploy the technology once there is certainty surrounding the availability of additional spectrum and on specific frequency bands support immediate action. Finally, the time the Commission will need to resolve difficult spectrum allocation issues and to study the bands identified by WRC-2000, requires that work begin now so the Commission can make timely decisions on these critical spectrum issues.

Respectfully submitted,


Lolita D. Smith
Staff Counsel

Michael F. Altschul
Vice President and General Counsel

Randall S. Coleman
Vice President Regulatory Policy & Law

**CELLULAR TELECOMMUNICATIONS
INDUSTRY ASSOCIATION**
1250 Connecticut Avenue, N.W.
Suite 800
Washington, D.C., 20036

September 12, 2000